



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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DOGM
MINERALS PROGRAM
FILE COPY

August 3, 1993

Mr. Thomas D. Anders
Environmental Affairs Specialist
Morton International, Incorporated
Morton International Building
100 N. Riverside Plaza, Randolph Street at the River
Chicago, Illinois 60606-1597

Dear Mr. Anders:

Re: Review of Notice of Intention to Commence Large Mining Operations, Morton International, Morton Salt Division, Grantsville Operations, M/045/037, Tooele County, Utah

The Division has completed its review of your April 2, 1993 deficiency response. After reviewing the information, the Division has several comments which need to be addressed before Tentative Approval can be granted for this permit application. The comments are listed below under the applicable Minerals Rule heading. Please format your response in a similar fashion.

R647-4-105 Maps, Drawings & Photographs

105.2.11 Proposed surface facilities

Thank you for your clarification of the facilities location and details of the facilities layout (Enclosure #1 and #4). Enclosures 2, 3 and 6 appear to be enlarged copies of the drawings that were provided in the original submission with no new information.

Two drawings included with the initial submission were labelled as "Burmester Facility General Plan of Mill" and "Burmester Facility Utilities". Your latest response refers to these facilities as the Grantsville Mill Facilities. The Division will use your latest title to refer to these facilities (located northwest of Burmester) in any future correspondence. (AAG)

R647-4-106 Operation Plan

106.6 Plan for protecting & redepositing soils

What and where are the stockpiled soil areas that were removed by the previous owner, and how will these areas be protected until reapplication at final reclamation? Protection measures may include: posting of signs, interim vegetation establishment, berm construction, etc. These areas should also be identified on the operations map. Also, please provide the Division with an estimated volume of the soil material to be reapplied. (HWS)

106.7 Existing vegetation-species and amount

Morton's response states that an undisturbed vegetative reference area has been set aside for use upon final reclamation. The Division is willing to prepare a reclamation seedmix recommendation for the areas to be reclaimed. However, we are not in a position to perform the *vegetation survey* for Morton. This is the applicant's responsibility and is required to be included as part of the permit application/mining and reclamation plan. We apologize for any misunderstanding that may have occurred during previous conversations with Division staff.

Morton will be required to perform their own plant survey of the mine area to identify the predominant plant species and the cover values. A description of the methodology used to gain this information is also required. The Division will develop a recommended reclamation seedmix based upon the results of the vegetation survey. (HWS)

R647-4-107 Operation Practices

107.3 Erosion control & sediment control

Morton has indicated that Best Management Practices will be used to control onsite erosion and sedimentation. The Division will evaluate the detail of the Stormwater Pollution Prevention Plan once a copy is made available for our review to ensure its compliance with the requirements of this rule. The plan will then be made part of this permit application. (DWH)

R647-4-109 Impact Assessment

109.1 Impacts to surface & groundwater systems

Morton's latest response does not provide the specific technical supporting documentation previously requested to satisfy this section. However, the State Division of Water Quality (having primary jurisdiction for protection of the State's surface & groundwater resources), has granted a UPDES discharge permit, and is working with Morton to establish an acceptable General Storm Water Discharge Permit for non-point source discharges from the mine site. We will defer to DWQ's permitting requirements to satisfy the information required under this rule. (DWH)

R647-4-110 Reclamation Plan

110.1 Current & post mining land use

Post-mine land use typically falls under the categories of wildlife habitat, livestock grazing, farming, industrial use, residential, commercial, etc. Please identify which category(ies) the site will fall under upon cessation of mining activities (post-mining). Adequate supporting justification must be provided for each type of proposed postmining landuse. (HWS)

110.3 Description of facilities to be left (post mining use)

The Division understands that only the canals in the immediate vicinity of the dikes to be reclaimed will be backfilled. All other dikes will be left to erode naturally. We also acknowledge that the Stansbury Island road bed is owned and maintained by Tooele County and is not included as part of Morton's reclamation responsibility. The Division will accept Morton's acceptance for breaching the outer dike at the time of final reclamation if the State/County does not choose to retain/maintain the dike. (AAG)

110.5 Revegetation planting program

The Division is not in a position to perform a plant survey for Morton. However, as indicated under section R647-4-106.7 (above), we will utilize the survey information produced by Morton to develop a seed mix recommendation. If the

operator is unable to generate this type of information utilizing inhouse expertise, then we suggest acquiring the services of an experienced contractor to obtain the required survey information. (HWS)

R647-4-112 Variance

The variance request for the Stansbury Island Road & outer dike variance is acceptable to the Division. All areas other than the area designated as the reclamation site map on Enclosure #4 will receive a variance for revegetation. The reclamation site area will not receive a variance and must be reclaimed to the 70% standard. This will require the establishment of a native plant cover value. This value cannot be established until a plant survey has been performed of the adjacent undisturbed areas associated with the reclamation site area. (HWS)

R647-4-113 Surety

The Division has prepared a revised reclamation surety estimate based upon the figures provided by Morton in their latest response (copy enclosed). The total amount of surety in 1998 dollars is \$1,273,000. This includes a 10% contingency adjustment and a 5 year - 1.42% escalation factor. We have enclosed an updated copy of the Reclamation Contract agreement (FORM MR-RC). This form must be completed and returned to the Division along with the selected form of surety. Please let us know what form of surety you would like to file with us. We have a number of different surety forms available that are acceptable to the Board of Oil, Gas and Mining. A *joint* surety form will likely be required if federal or state lands are involved.

Once these comments have been satisfactorily addressed, the Division can grant tentative approval of the Notice of Intention. We will then publish a public notice initiating a 30-day public comment period. At the completion of the public comment period (assuming no adverse substantive comments are received), the Division will seek approval of the amount and form of reclamation surety from the Board of Oil, Gas and Mining (Board) at its regular monthly hearing.

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M/045/037
August 3, 1993

If you have any questions regarding this letter or the next steps before Board approval, please contact me or Tony Gallegos of the Minerals staff. Thank you for your cooperation in completing this permitting action.

Sincerely,

A handwritten signature in cursive script, reading "D. Wayne Hedberg". The signature is written in dark ink and is positioned above the printed name and title.

D. Wayne Hedberg
Permit Supervisor
Minerals Regulatory Program

jb

Enclosures

cc: Lloyd Godfrey, Morton Salt - Grantsville
Mike Ford, BLM, Pony Express R.A.
Lowell Braxton, DOGM

M045037.REV

RECLAMATION ESTIMATE

Morton International, Inc.

Morton Salt - Grantsville Facility

M/045/037

last revision

Tooele County

07/29/93

Prepared by Utah State Division of Oil, Gas & Mining

Reclamation Details

- This estimate has been adjusted according to the 4/2/93 response
- All structures & facilities to be demolished/removed
- Six barriers around propane tank removed, tank leased
- Water wells (4 @ 800 ft deep) to be abandoned according to rules
- Dikes highlighted to be leveled to within 1 ft of present pond levels
- All underground gas, water & conduit piping to be excavated & removed
- Water tank excavated & removed; asphalt at mill site removed
- Areas to be ripped & revegetated shown on "Reclamation Site Map"

Description	Amount	\$/Unit	Cost-\$
Building code 1 demolition	50,298 SF	0.60	30,179
Building code 2 demolition	42,906 SF	1.00	42,906
Building code 3 demolition	322,443 CF	0.21	67,713
Concrete floors demolition	99,067 SF	4.13	409,147
Concrete footings demolition	5,216 LF	11.18	58,315
Rail line removal	1,256 LF	14.20	17,835
Propane tank barriers	1 set	273	273
Water wells	4 wells	3,000	12,000
Dike leveling	19,250 feet	1.23	23,678
Underground piping	1 sum	5,000	5,000
Asphalt removal	34,102 SY	5.80	197,792
Water tank removal	1 tank	2,000	2,000
Ground ripping	26.16 acres	749	19,594
Backfilling	1 sum	5,300	5,300
Revegetation	15.49 acres	1,168	18,092
Haulage and dump fees	1 sum	165,000	165,000
Mobilization (4 pieces equipment)	4 each	1,000	4,000
SUBTOTAL			1,078,823
+ 10% CONTINGENCY			107,882
SUBTOTAL			1,186,705
+ 5 yr ESCALATION(1.42%)			86,683
TOTAL			1,273,388
ROUNDED TOTAL IN 1998-\$			\$1,273,000
Avg. cost/acre (160+33=163 acre)=			
7,810 \$/acre			